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OCT 10 2023

U.S. District Court  
Middle District of TN

## UNITED STATES DISTRICT COURT

for the

Middle District of Tennessee

\_\_\_\_ Division

Terrance Reese

Plaintiff(s)

(Write the full name of each plaintiff who is filing this complaint. If the names of all the plaintiffs cannot fit in the space above, please write "see attached" in the space and attach an additional page with the full list of names.)

-v-

Core Clark et al. See Attached

Defendant(s)

(Write the full name of each defendant who is being sued. If the names of all the defendants cannot fit in the space above, please write "see attached" in the space and attach an additional page with the full list of names.)

Case No. \_\_\_\_\_

(to be filled in by the Clerk's Office)

Jury Trial: (check one) ☒ Yes ☐ No

## COMPLAINT FOR A CIVIL CASE

## I. The Parties to This Complaint

## A. The Plaintiff(s)

Provide the information below for each plaintiff named in the complaint. Attach additional pages if needed.

Name

Street Address

City and County

State and Zip Code

Telephone Number

E-mail Address

Terrance Reese  
140 macon way  
Hartsville, Transdake County  
Tennessee, 37074

## B. The Defendant(s)

Provide the information below for each defendant named in the complaint, whether the defendant is an individual, a government agency, an organization, or a corporation. For an individual defendant, include the person's job or title (if known). Attach additional pages if needed.

Defendant No. 1

Name Jermarris Porter  
Job or Title (if known) Chief of Security  
Street Address 140 Macon Way  
City and County Hartsville, Transdake County  
State and Zip Code Tennessee, 37074  
Telephone Number \_\_\_\_\_  
E-mail Address (if known) \_\_\_\_\_

Defendant No. 2

Name Jacqueline Norman  
Job or Title (if known) Assistant warden  
Street Address 140 Macon Way  
City and County Hartsville, Transdake County  
State and Zip Code Tennessee, 37074  
Telephone Number \_\_\_\_\_  
E-mail Address (if known) \_\_\_\_\_

Defendant No. 3

Name Ajee Smith  
Job or Title (if known) Captain  
Street Address 140 Macon Way  
City and County Hartsville, Transdake County  
State and Zip Code Tennessee, 37074  
Telephone Number \_\_\_\_\_  
E-mail Address (if known) \_\_\_\_\_

Defendant No. 4

Name Remona Johnson  
Job or Title (if known) Unit manager  
Street Address 140 Macon Way  
City and County Hartsville, Transdake County  
State and Zip Code Tennessee, 37074  
Telephone Number \_\_\_\_\_  
E-mail Address (if known) \_\_\_\_\_

Additional Page with full list of all said defendants.

Defendant no. 1.) Jermaris Porter

Defendant no. 2.) Jacqueline Worman

Defendant no. 3.) Ajee Smith

Defendant no. 4.) Remona Johnson

Defendant no. 5.) Vince Vantell  
warden

140 Macon Way  
Hartsville, Trousdale County  
Tennessee, 37074

Defendant no. 6.) Core Civils Inc.  
private Corporation

140 Macon Way  
Hartsville, Trousdale County  
Tennessee, 37074

**II. Basis for Jurisdiction**

Federal courts are courts of limited jurisdiction (limited power). Generally, only two types of cases can be heard in federal court: cases involving a federal question and cases involving diversity of citizenship of the parties. Under 28 U.S.C. § 1331, a case arising under the United States Constitution or federal laws or treaties is a federal question case. Under 28 U.S.C. § 1332, a case in which a citizen of one State sues a citizen of another State or nation and the amount at stake is more than \$75,000 is a diversity of citizenship case. In a diversity of citizenship case, no defendant may be a citizen of the same State as any plaintiff.

What is the basis for federal court jurisdiction? *(check all that apply)*



Federal question



Diversity of citizenship

Fill out the paragraphs in this section that apply to this case.

**A. If the Basis for Jurisdiction Is a Federal Question**

List the specific federal statutes, federal treaties, and/or provisions of the United States Constitution that are at issue in this case.

42 U.S.C. 1983, eighth amendment violation

**B. If the Basis for Jurisdiction Is Diversity of Citizenship****1. The Plaintiff(s)****a. If the plaintiff is an individual**

The plaintiff, *(name)* \_\_\_\_\_, is a citizen of the  
State of *(name)* \_\_\_\_\_.

**b. If the plaintiff is a corporation**

The plaintiff, *(name)* \_\_\_\_\_, is incorporated  
under the laws of the State of *(name)* \_\_\_\_\_,  
and has its principal place of business in the State of *(name)* \_\_\_\_\_.

*(If more than one plaintiff is named in the complaint, attach an additional page providing the same information for each additional plaintiff.)*

**2. The Defendant(s)****a. If the defendant is an individual**

The defendant, *(name)* \_\_\_\_\_, is a citizen of  
the State of *(name)* \_\_\_\_\_. Or is a citizen of  
*(foreign nation)* \_\_\_\_\_.

b. If the defendant is a corporation

The defendant, (name) \_\_\_\_\_, is incorporated under the laws of the State of (name) \_\_\_\_\_, and has its principal place of business in the State of (name) \_\_\_\_\_.  
Or is incorporated under the laws of (foreign nation) \_\_\_\_\_, and has its principal place of business in (name) \_\_\_\_\_.

*(If more than one defendant is named in the complaint, attach an additional page providing the same information for each additional defendant.)*

3. The Amount in Controversy

The amount in controversy—the amount the plaintiff claims the defendant owes or the amount at stake—is more than \$75,000, not counting interest and costs of court, because *(explain)*:

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**III. Statement of Claim**

Write a short and plain statement of the claim. Do not make legal arguments. State as briefly as possible the facts showing that each plaintiff is entitled to the damages or other relief sought. State how each defendant was involved and what each defendant did that caused the plaintiff harm or violated the plaintiff's rights, including the dates and places of that involvement or conduct. If more than one claim is asserted, number each claim and write a short and plain statement of each claim in a separate paragraph. Attach additional pages if needed.

*Please See additional page for Statement of Claim*

**IV. Relief**

State briefly and precisely what damages or other relief the plaintiff asks the court to order. Do not make legal arguments. Include any basis for claiming that the wrongs alleged are continuing at the present time. Include the amounts of any actual damages claimed for the acts alleged and the basis for these amounts. Include any punitive or exemplary damages claimed, the amounts, and the reasons you claim you are entitled to actual or punitive money damages.

# Statement of Claim

On August 4, 2023, four medium custody level inmates came into my cell with knives and ordered me to leave out the cell while they talk to my cellmate. I tried to put on my shoes before i left out and one of the guys put his knife to my throat and told me to leave out in my shower sandals. when i left out, two or three minutes later all of them came out of my cell with my T.V., shoes, and all of my food, along with all of my cellmates belongings. After we were robbed they told us we had to leave the building so we let the officer working the pool know what happened and let him know that we were told that we had to leave the building. He then placed us in the hallway and told us he would contact the Chief of Security, Derranis Porter, and let him know that we were assaulted and robbed. After hours of sitting in the hallway the officer told us that he could not get in contact with Chief Porter. As we were sitting in the hallway we talked to a Sgt. Christian who told us to write down our information and she would personally give it to Chief Porter and let him know what happened to us. After some time passed Sgt. Christian came back and told us that she gave Chief Porter our information and explained to him what happened to us but we still never heard from Chief Porter. As we continued to sit in the hallway the assistant warden, Jacqueline Norman came in the building and asked us why was our beds sitting in the hallway and we explained that we were

assaulted and robbed and told to leave the building and she told us that soon as court cleared she would get us out of the building. we never heard back from A.W. Norman. After hours more of sitting in the hallway we talked to a Sgt. Smith who told us that Chief Porter and A.W. Norman was gone for the night. He told us to write down our information and he would give it to Captain Hjee Smith and explain to her that we were assaulted and robbed and told to leave the building and that he would get permission from her to move us out of the building. He took us out of the building and placed us in a rec cage outside of the building. After hours of sitting outside in the cage Sgt. Smith came back and told us that Captain Smith told him to put us back in the building because she did not have time for us at the moment. On August 8, 2023 I was robbed again. I talked to the unit manager Remona Johnson day after day pleading with her to please move me out of the building and let her know that the guys who assaulted and robbed me was continuing to harass me for filing a incident report against them. She told me that she was not moving me and if I kept bothering her she would send me to the hole. I then wrote the warden, Vinne Vantelli, and explained to him that I was assaulted and robbed and told to leave the building and pleaded with him to please move me out of the building. I never heard



nothing back from the warden either. I was moved from the pod that i was assaulted and robbed in to a pod right next door. The people who assaulted and robbed me come in the pod i was moved to all the time and sell drugs and robs other people. On August 18, 2023, someone who associate with the people who assaulted and robbed me came from the pod i was robbed and assaulted in to the pod i was placed in and came into my cell and threatened me with a knife and told me to stop running my mouth to the officers about me being robbed. Core civic has a policy in place mandating that medium custody level inmates shall not be housed together with minimum custody level inmates, and they also have a policy in place mandating that no inmate shall be allowed to enter into a pod that the inmate is not housed in.

## Claims

Count one: Chief of Security, Dermanis Porter, was made aware of the fact that i was assaulted and robbed at knife point and told to leave the building and that my safety and freedom was at risk, but he ignored my pleas for help and disregarded the risk to my safety and freedom.

Count two: A.W., Jacquelyn Norman, was made aware of the fact that i was assaulted and robbed at knife point and told to leave the building and that my safety and freedom was at risk, but she ignored my pleas for help and disregarded the risk to my safety and freedom.



Count three: Captain, Ajee Smith, was made aware of the fact that I was assaulted and robbed at knife point and told to leave the building, and that my safety was at risk, but she ignored my pleas for help and disregarded the risk to my safety and freedom.

Count four: unit manager, Remona Johnson, was made aware of the fact that I was assaulted and robbed at knife point and told to leave the building, and that my safety and freedom was at risk, but she ignored my pleas for help and disregarded the risk to my safety and freedom.

Count five: The warden, Vince Vantell, was made aware of the fact that I was assaulted and robbed at knife point and told to leave the building, and that my safety and freedom was at risk, but he ignored my pleas for help and disregarded the risk to my safety and freedom.

Count six: Core Civic Inc., was well aware of the fact that medium custody level inmates were not to be housed with minimum custody level inmates because that is what their policy stated, but they disregarded the risk to all minimum custody level inmates by allowing medium custody level inmates to be housed together with minimum custody level inmates. I am a minimum custody level inmate and I was also aware of the fact that inmates were not allowed to enter into a pod they were not housed in, per policy.


## Relief Requested

For all said defendants who violated and continuing to violate at this present time, Plaintiff's eighth amendment right to protection against cruel and unusual punishment, Plaintiff respectfully ask to be rewarded actual (compensatory) damages and punitive damages from each defendant individually. As to defendant one, Seimaris Porter, Chief of Security, Plaintiff ask to be rewarded \$50,000 in actual damages and \$50,000 in punitive damages. As to defendant two, A.W. Jacquelyn Norman, Plaintiff ask to be rewarded \$50,000 in actual damages and \$50,000 in punitive damages. As to defendant three, Captain Aje Smith, Plaintiff ask to be rewarded \$50,000 in actual damages and \$50,000 in punitive damages. As to defendant four, Unit Manager Remona Johnson, Plaintiff ask to be rewarded \$50,000 in actual damages and \$50,000 in punitive damages. As to defendant five, Vice warden of prison, Plaintiff ask to be rewarded \$50,000 in actual damages and \$50,000 in punitive damages. And as to defendant six, Core Civic incorporation, Plaintiff ask to be rewarded \$250,000 in actual damages and \$250,000 in punitive damages.

Plaintiff also respectfully request for this honorable court to accept plaintiff's application to proceed in district court without prepaying fees or cost.

Furthermore, Plaintiff prays that this Honorable Court appoint Counsel to Plaintiff and set a Jury trial date on the matters in Plaintiff's Complaint for a Jury to determine the merits of relief that Plaintiff is requesting to be granted in Plaintiff's favour.

Respectfully Submitted this 29, Day of September 2023.

  
Terrance Reese #505698  
TTLL  
140 Macon way  
Hartsville, TN, 37074

**V. Certification and Closing**

Under Federal Rule of Civil Procedure 11, by signing below, I certify to the best of my knowledge, information, and belief that this complaint: (1) is not being presented for an improper purpose, such as to harass, cause unnecessary delay, or needlessly increase the cost of litigation; (2) is supported by existing law or by a nonfrivolous argument for extending, modifying, or reversing existing law; (3) the factual contentions have evidentiary support or, if specifically so identified, will likely have evidentiary support after a reasonable opportunity for further investigation or discovery; and (4) the complaint otherwise complies with the requirements of Rule 11.


**A. For Parties Without an Attorney**

I agree to provide the Clerk's Office with any changes to my address where case-related papers may be served. I understand that my failure to keep a current address on file with the Clerk's Office may result in the dismissal of my case.

Date of signing: 9-29-23

Signature of Plaintiff

Printed Name of Plaintiff



Terrance Reese

**B. For Attorneys**

Date of signing: \_\_\_\_\_

Signature of Attorney

Printed Name of Attorney

Bar Number

Name of Law Firm

Street Address

State and Zip Code

Telephone Number

E-mail Address



Terrance Reese #505698  
T.T.L.L.  
140 Macon way  
Hartsville, TN, 37074



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U.S. District Court  
Middle District of TN

United States District Court  
Clerk of Court  
Lynda M. Hill  
Fred D. Thompson Court House  
719 Church Street  
Nashville, TN, 37203

